

# Grant Law, LLC

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January 22, 2024 (Filed in Pacer Only)

Hon. Renee Bumb, USDJ  
Mitchell H. Cohen Building  
& U.S. Courthouse 4<sup>th</sup> & Cooper Streets  
Camden, NJ 08101

**RE: Abdullah versus Rowan University case number 1:21 -cv- 19256- Concerning defendants' motion to dismiss with prejudice currently pending**

Your Honor:

Please accept this correspondence as a brief follow-up to my letter yesterday to the court, seeking additional time for this office to respond to the defendants' motion to dismiss with prejudice.

Ms. Abdullah was in touch with me, sent me her written effort as a pro se defendant, on or about, about January 9, to respond to the defendants' motions, and practically implored me to represent her

After reviewing her potential submission, she submitted my letter of January 12, 2024, requesting the additional time for this office to respond to the defendants' motions. The request for additional time was made before the due date for submission of her responsive papers of January 15, 2024, pursuant to your honor's text order of December 22, 2023. It is also worth noting that on November 30, Ms. Abdullah, on her own accord, sent a letter to the court, requesting that I be allowed to enter the case for motion purposes only, but she never received a response to the best of her recollection.

I realized, notwithstanding that she is a PhD candidate in education, that she was clearly not qualified or capable of making valid and convincing legal arguments to oppose the dispositive motion.

I simply wanted the court to be aware of why I directly requested additional time. As I have mentioned previously, I have been a member of the bar for over 38 years and am in the process of winding down my practice; hence, my reluctance to enter fully into the case. However, if the motion is denied, I will make sure she has competent counsel.

However, I feel her case has merit and deserves proper representation, and the additional request for time will not have a deleterious effect on any of the defendants in this case.

For all the submitted reasons, I genuinely and respectfully ask this court to grant the additional time requested for the plaintiff to respond to the defendants' motions.

Respectfully submitted,  
Gary Grant  
Grant Law LLC attorney on motion for Shariese Abdullah